

OLYMPIC COAST  
NATIONAL  
MARINE  
SANCTUARY  
ADVISORY  
COUNCIL



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December 2, 2003

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*U.S. Navy*

*Artwork:*

*David*  
*Sones*

Carol Bernthal, Superintendent  
Olympic Coast National Marine Sanctuary  
115 East Railroad Avenue, Suite 301  
Port Angeles, WA 98368

Dear Ms. Bernthal:

The Olympic Coast National Marine Sanctuary Advisory Council (the Council) wishes to forward to you our comments of the scope of issues that the U.S. Navy should consider in developing an Environmental Impact Statement (EIS) for the Pacific Northwest Range Extension Proposal (the Proposal). The Council has previously received a briefing from Navy personnel on aspects of the Proposal. While the Council understands that the Proposal also impacts other areas of the Northwest Range Complex, per its Charter it is confining its comments to those aspects of the Proposal that potentially impact Sanctuary Resources.

The Council lauds the Navy for making a decision at the outset to go through a full NEPA process and produce an EIS for the Proposal. The Council also notes, however, that information on the exact nature of the activities that the Navy envisions conducting in or adjacent to Sanctuary waters is very vague at this point. As such, it makes it very difficult to anticipate with any degree of certainty the magnitude and scope of impacts from the Proposal. *Therefore the Council urges that the Navy make every effort possible to more fully define its activities at the earliest possible date.*

Olympic Coast National Marine Sanctuary  
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Based on our current understanding of the proposal, there are a number of proposed activities potentially adversely affecting Sanctuary resources. Since the proposal calls for an expansion of the types of activities that normally would occur within current Quinault Underwater Tracking Range to the entire W237A operating area, the activities may affect a much wider range of environments than is presently the case. Equally as important, the addition of a surf zone landing area brings an entire new environment into the Underwater Tracking Range that is neither in the present test range or the operating area. Because of these aspects of the proposal, the Council feels that the scope of issues undertaken for analysis and impact assessment in the EIS should, *at a minimum*, include the following:

- 1) Any seafloor disturbance related to the temporary or permanent placement of cables, listening devices, targets, anchors, or Unmanned Underwater Vehicle (UUV) movements along the seafloor;
- 2) Damage to intertidal, island or upland resources in the proposed surf landing zone on the Quinault Nation's Reservation or, if alternate sites are considered within the Sanctuary boundaries, then consideration of the impacts to Sanctuary resources and damage to intertidal or upland areas of islands caused by wakes of vessels Navy vessels operating in the area.
- 3) The potential for acoustic devices transmissions to cause damage, disturbance or harassment to marine mammals, rockfish, migratory fish species, and/or crab;
- 4) Noise disturbance by aircraft or surface vessels of nesting or migratory water fowl, shorebirds or other marine avian species within the Sanctuary area;
- 5) Damage to historical resources or other cultural resources within the Sanctuary
- 6) Limitation of other recreational uses of the Sanctuary by sport fishermen, kayakers and boaters, and hikers and campers;
- 7) Interference with tribal and non tribal commercial fishing operations within Sanctuary waters;
- 8) Interference with activities by tribal members engaged in ceremonial harvesting of resources;
- 9) Any activities associated with testing that might lead to either intentional or accidental discharges of pollutants within Sanctuary waters and the capacity to clean up and/or restore damaged resources.
- 10) Impacts caused by the loss of any of the UUV or the range support equipment where recovery is infeasible or would cause more damage than leaving it alone;
- 11) Potential for Navy activities to interfere with research being conducted within the Sanctuary within the W237A operating area, either on a temporary basis or long-term denial of access to or restriction of data acquisition to certain areas; and,

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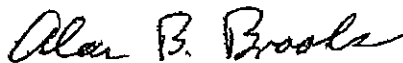
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- 12) The need to consider other alternatives for the proposed extension of activities in operating area W237A rather than just an action/no action alternative, including the need to look at other areas outside the Sanctuary as potential sites for conducting the proposed range operations. This should entail looking at sites that may be geographically distant, such as other areas along the west coast, east coast, or gulf coasts.
- 13) Impacts on commercial shipping due to increased presence of Naval surface vessels as well as submarines.

We request that you will forward these comments on to the appropriate office within the Navy as noted in the Federal Register notice. The Council will continue to monitor this proposal and comment as appropriate in the future.

Sincerely,



Al Brooks, Chair